## **EXHIBIT B**

## Mims, Peter

From: William E. Hilton [whilton@GC-LAW.com]

Sent: Monday, April 24, 2006 11:42 AM

To: Mims, Peter

Subject: RE: Drawings for ProLock 1 and ProLock 2

Hi Peter, I received the final copy of the agreement – thanks.

Turning to the briefs, I expect that your client may wish to identify dimensions of certain parts of the products. As you know, we removed the confidentiality status of the drawings that included no dimensions.

If plaintiff wishes to refer to certain dimensions of the products, we are now required to either have the parts measured by our client, or not copy them in briefs or arguments based on the attached drawings. Clearly we would need to measure the parts themselves. I would like to avoid an issue with the authenticity of any such measurements, and therefore ask that all of the attached drawings now be made non-confidential for purposes of the summary judgment briefs and hearing. I note that these drawings include no tolerance ranges. Although the drawings had been made available for Mr. Davis to review in connection with the settlement agreement, I will now need to work with others at Inner Tite in connection with the summary judgment.

Can we agree to de-classify these as non-confidential?

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----Original Message----

From: Mims, Peter [mailto:peter.mims@velaw.com]

**Sent:** Thursday, March 16, 2006 7:13 PM

To: William E. Hilton

Cc: 'Binz DeWalch' (E-mail); Mark DeWalch (E-mail); 'Mike Evans' (E-mail)

Subject: Drawings for ProLock 1 and ProLock 2

Dear Bill:

As requested as part of the Settlement Agreement, please find enclosed drawings to be referenced in the Exhibit to the Settlement Agreement. These drawings are highly confidential, and accordingly, DeWalch is providing these drawings designated as "HIGHLY CONFIDENTIAL Pursuant to Court Order" under the Confidentiality Agreement and Protective Order.

Our client has authorized you to disclose these drawings to your client solely in the context of the settlement discussions alone as "Confidential Information - Pursuant to Court Order" under the Confidentiality Agreement and Protective Order. Of course, this information is subject to all the restrictions designated as Confidential Information - Pursuant to Court Order under the provisions of the Confidentiality Agreement and Protective Order, and the use of these drawings is limited to this litigation.

I have also sent to you via overnight courier an example of the ProLock 2 product. Now that the drawings and example of the ProLock 2 have been provided to Inner-Tite, we look forward to your client's comments regarding the draft Settlement Agreement.

If you have any questions or wish to discuss, please feel free to call.

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